

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, THE LAW
OFFICES OF STEVEN R. DONZIGER,
et al.,

Defendants.

CASE NO. 11-CV-0691(LAK)

**DECLARATION OF TY DOYLE IN
SUPPORT OF RESPONSE TO
CHEVRON CORPORATION'S
MEMORANDUM OF LAW IN
OPPOSITION TO DEFENDANTS
MOTION TO STRIKE AFFIDAVITS
ACCOMPANYING CHEVRON'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT [DKT.#976]**

I, Ty Doyle, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an associate at the law firm of Smyser Kaplan & Veselka, L.L.P., counsel for Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje (“Defendants”) in the above-captioned matter. I am licensed to practice in the State of New York and before this Court. I make this declaration based on personal knowledge and in support of Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje’s Response to Chevron’s Memorandum of Law in Opposition to Defendants’ Motion to Strike Affidavits Accompanying Chevron’s Motion for Partial Summary Judgment (Dkt. #976).

2. Attached hereto as Exhibit A is a true and correct (copy of Alberto Guerra and Andres Rivero Transcription/Translation of the Meeting of July 13, 2012 bates numbered CVX-RICO-5916724-5916815 as produced with redactions by Chevron.

3. Attached hereto as Exhibit B is a true and correct copy of Chevron Corporation's Objections and Responses to Donziger Defendants First Request to Plaintiff for the Production of Documents served August 13, 2012.

Dated: April 15, 2013.
Houston, Texas

By: /s/ Ty Doyle
Tyler G. Doyle
NY Bar No. 4372637